

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VERRAGIO, LTD.,

Plaintiff,

vs.

PHANTOM JEWELS,

Defendant.

Case No. 1:18-cv-00865 (AT)

**PROPOSED ORDER FOR DEFAULT  
JUDGMENT AND INJUNCTION**

On January 8, 2018, Plaintiff, Verragio LTD, filed a complaint against Defendant, Phantom Jewels, seeking damages and injunctive relief for violations of the Copyright Laws of the United States, 17 U.S.C. §§ 101, *et seq.* This Court has personal jurisdiction over Plaintiff and Defendant, and subject matter jurisdiction of the matters in controversy between Plaintiff and Defendant. Venue in this judicial district is proper.

Proper service of process has been affected on Defendant on February 23, 2018 by delivering of the Summons and Complaint to Defendant on March 5, 2018 via International Registered Mail.

Defendant has failed to answer or otherwise defend this action, and on April 18, 2018, the Clerk issued Certificate of Default.

Upon application by Plaintiff on May 18, 2018, the Court issued an Order to Show Cause why an order of Default Judgment and Permanent Injunction should not be entered against Defendant. The Court has carefully considered the Complaint, the allegation of which are well-pleaded and hereby taken as true, Plaintiff's application, and other written submissions of Plaintiff filed with the Court, and being fully advised in the premises, pursuant to Fed. R. Civ. P. 55(b)(2), it is hereby Ordered and Adjudged that:

1. Pursuant to 17 U.S.C. 504, Defendant is liable to Plaintiff in the amount of One Hundred Thousand Dollars (\$100,000.00) for infringement of Plaintiff's copyrights in violation of 17 U.S.C. 501.

2. Pursuant to 17 U.S.C.S. § 505, Defendant shall further pay Plaintiff's cost of suit herein in the amount of Eight Thousand Eight Hundred Two Dollars and 50 Cents (\$8,802.50), inclusive of attorneys' fees and court costs.

3. Pursuant to 17 U.S.C. § 502, Defendant, and its officers, agents, servants, employees and attorneys, and all persons in active concert or participation with them, shall be and hereby are **permanently enjoined** from directly or indirectly infringing Plaintiff's rights under the laws of the United States in Plaintiff's copyrighted jewelry design having the United States Copyright Registration No.: VA 1-974-011, and in any other jewelry designs, whether now in existence or later created, that are owned or controlled by Plaintiff.

SO ORDERED.

Dated:

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HON. ANALISA TORRES  
United States District Judge